

Darold W. Killmer, No. 8-6643
Reid Allison*
Madison Lips*
KILLMER LANE, LLP
1543 Champa St., Suite 400
Denver, CO 80202
dkillmer@killmerlane.com, rallison@killmerlane.com, mlips@killmerlane.com
Tel: (303) 571-1000

Elisabeth C. Frost*
Katie Chamblee-Ryan*
Daniel Cohen*
Nicole Wittstein*
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW, Suite 400
Washington, D.C. 20002
efrost@elias.law, kchambleeryan@elias.law, dcohen@elias.law, nwittstein@elias.law
Tel: (202) 968-4490

**Admitted pro hac vice
Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

EQUALITY STATE POLICY CENTER,)	
)	
Plaintiff,)	
v.)	
)	
CHUCK GRAY, in his official capacity as)	Civil Action No. 25-cv-00117-SWS
Wyoming Secretary of State, <i>et al.</i> ,)	
)	
Defendants.)	

**NOTICE OF SUPPLEMENTAL EXHIBIT IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

Attached hereto as Exhibit 38 to Plaintiff Equality State Policy Center's motion for preliminary injunction (Doc. 16), is a supplemental exhibit submitted in support of that motion. Exhibit 38 is a press release, dated July 8, 2025, reporting the outcome of an investigation into potential voter fraud during the 2024 election by the Laramie County Sheriff's Office. As reflected

by the press release, the Sheriff’s Office concluded that *not one* individual flagged by the Laramie County Clerk’s Office for potential voting violations was in fact an ineligible noncitizen. Plaintiff submits this exhibit as promptly as possible after learning of the results of the Laramie County investigation, and it is timely under Local Civil Rule 7.1(c)(4).

Earlier this year, the Laramie County Clerk’s Office referred 24 individuals to the county sheriff for potential voting irregularities during the 2024 primary or general election. *See* Ex. 38. Of this group, the clerk flagged thirteen individuals “for potential ineligibility to vote due to concerns about their citizenship status.” *Id.* The Sheriff’s Office coordinated with U.S. Immigration and Customs Enforcement “to verify each individual’s status,” and now reports that, after “a thorough investigation, ICE confirmed that all 13 individuals were legally present in the United States and had voted legally.” *Id.*

The results of this investigation further underscore the utter dearth of “concrete evidence” that a documentary proof of citizenship requirement is necessary to prevent noncitizens from voting. *See* Doc. 16 at 16-17 (quoting *Fish v. Schwab*, 957 F.3d 1105, 1132 (10th Cir. 2020)). Moreover, it is yet further evidence that “existing safeguards work.” *Id.* at 17. Exhibit 38 thus offers additional support for Plaintiff’s argument that the State’s interest in preventing noncitizen voter fraud cannot justify the significant burden HB 156 imposes on the right to vote.

Dated: July 9, 2025

Respectfully submitted,

/s/ Elisabeth C. Frost
Darold W. Killmer, No. 8-6643
Reid Allison*
Madison Lipps*
Killmer Lane, LLP
1543 Champa St., Suite 400
Denver, CO 80202
dkillmer@killmerlane.com
(303) 571-1000

Elisabeth C. Frost*
Katie Chamblee-Ryan*
Daniel Cohen*
Nicole Wittstein*
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW, Suite 400
Washington, D.C. 20002
efrost@elias.law
kchambleeryan@elias.law
dcohen@elias.law
nwittstein@elias.law
(202) 968-4490

Attorneys for Plaintiff
Equality State Policy Center
**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that on the 9th day of July, 2025, I electronically filed the foregoing brief with the Clerk of the Court for the United States District Court for the District of Wyoming by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Elisabeth C. Frost
Elisabeth C. Frost